UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

July 17, 1995

Mr. Peter Runton
130 Randolph Avenue
Milton, MA 02186

Dear Mr. Runton:

The U.S. Environmental Protection Agency New England office has received a copy of the Response Action Outcome report for the former Winchester Industries Inc. property at 230 and 280 Bodwell Street in Avon, Massachusetts (EPA ID# MAD985278670). This report by Coneco Environmental, dated July 13, 1995, will be included in the Superfund Site Assessment program site file. The information contained in this report will be taken into consideration in determining whether further evaluation of the site is appropriate under the federal program. At present, the former Winchester Industries Inc. site has been assigned a low priority for further evaluation under the Superfund Site Assessment program.

If you have any questions, I may be reached at (617) 573-9697.

Sincerely,

Nancy Smith

Nancy Smith
Site Assessment Manager
Waste Management Division

cc: Mr. Harish Panchal, MA DEP

CONECO ENVIRONMENTAL

ENGINEERS & SCIENTISTS

BRIDGEWATER, MA
PROVIDENCE, RI
GLASTONBURY, CT

Letter of Transmittal

To: Ms. Nancy Smith
US EPA
JFK Federal Building
Boston, MA 02203

Date: July 13, 1995
File No.: 3184
Subject: 230 and 238 Bodwell Street, Avon

We are sending you: ☑ Attached ☐ Under Separate Cover

The Following Items:

Copies	Date	Description
1	4/19/95	Phase I - Initial Site Investigation, Former Winchester Industries, Inc., 230 and 238 Bodwell Street, Avon, Massachusetts, DEP Site No. 4-0634, MAD 985278670
1	6/20/95	Response Action Outcome, Former Winchester Industries, Inc., 230 and 238 Bodwell Street, Avon, Massachusetts, RTN 4-0634, MAD 985278670

These are Transmitted as Checked Below:

☐ For your information ☑ For your use ☐ Approved as Noted
☐ As Requested ☐ For Approval ☐ For Review

Remarks:

Copy to:

Signed CKM
Brian F. Klingler
Project Manager

RESPONSE ACTION OUTCOME

FORMER WINCHESTER INDUSTRIES, INC.

230 AND 238 BODWELL STREET

AVON, MASSACHUSETTS

RTN 4-0634

SUBMITTED TO:

Mr. Peter Runton
130 Randolph Avenue
Milton, MA 02186

June 20, 1995
Project No. 3184

CONECO ENVIRONMENTAL

ENGINEERS & SCIENTISTS

BRIDGEWATER, MA
PROVIDENCE, RI
GLASTONBURY, CT

June 20, 1995
Project No. 3184

Mr. Peter Runton
130 Randolph Avenue
Milton, Massachusetts 02186

RE: Response Action Outcome
Former Winchester Industries, Inc.
230 and 238 Bodwell Street
Avon, Massachusetts
DEP Site No. 4-0634

Dear Mr. Runton:

Enclosed is the Response Action Outcome (RAO) Statement for Former Winchester Industries, Inc. 230 and 238 Bodwell Street in Avon, Massachusetts, hereinafter the "Site." The supporting documentation for this RAO includes the Phase I - Initial Site Investigation for the aforementioned Site, dated April 19, 1995 and submitted to the Southeast Regional Office of the DEP on April 28, 1995. This document includes the following:

- *Response Action Outcome Report*
- *Response Action Outcome Form*
- *Disposal Site Plan*

1.0 DISPOSAL SITE BACKGROUND

The Site is located in the Avon Industrial Park, approximately 200 feet north of the intersection between Bodwell Street and Ledin Drive in Avon, Massachusetts. A Site Locus Plan and Site Plot Plan are provided for reference as Figures 1 and 2, respectively.

The Site was first developed in 1972 with the construction of the Winchester Industries, Inc. building, which was used as a marine electrical switch manufacturing and assembly facility. This building is located on the southern portion of the Site (currently designated as 230 Bodwell Street). A second building (currently designated as 238 Bodwell Street) was constructed in the northern portion of the Site in 1979 as an addition to Winchester Industries, Inc. and was utilized for warehouse storage and office space by Winchester Industries, Inc. and the Jacques Tool Company. Both Site buildings were situated on one parcel of land, owned by Winchester Industries, Inc., previously designated as 230 Bodwell Street.

A series of Site investigations were conducted at the Site including an initial subsurface investigation by Kurz Associates, Inc. (KAI) in 1988 which detected concentrations of trichloroethene, trans-1,2-dichloroethene, and concentrations of xylenes in the groundwater at the Site. In addition, elevated concentrations of trichloroethene were detected in the two septic tanks associated with the Winchester Industries, Inc. manufacturing and assembly facility on the southern portion of the Disposal Site. The septic tanks were subsequently pumped out in June, 1988. Significantly reduced concentrations of chlorinated compounds were detected in this sample.

Due to the presence of chlorinated compounds discovered in the septic tank in the eastern portion of the Site, the Site was listed as a Non-Priority Disposal Site with the DEP and a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Site with the EPA.

A supplemental investigation was conducted by Gale Associates, Inc. in 1988 which consisted of the installation of a bedrock groundwater monitoring well, MW-5, southeast of the previously sampled septic tank/leaching field area. No VOCs or metals were detected in this monitoring well. Groundwater monitoring well KOW-2 was sampled in December 1988 and concentrations of trichloroethylene (1,300 ppb) and of tetrachloroethane (43 ppb) were detected. This groundwater monitoring well was sampled again in March 1989, and 520 ppb trichloroethylene was detected. Additional groundwater monitoring of KOW-2 detected no VOCs in five subsequent sampling rounds performed in February, March, June, and December of 1988 and March, 1989. An additional groundwater sampling round was conducted in 1991 and consisted of resampling of groundwater monitoring wells KOW-2, MW-4, and MW-5. No VOCs were detected in these three monitoring wells.

In 1992, this parcel was divided into a southern and northern parcel, 230 and 238 Bodwell Street, respectively. The southern portion of the Site was purchased by 230 Bodwell Corporation and has been occupied by Cuming Corporation, a manufacturer of flotation devices and radar absorption and deflective devices, since 1992. The northern portion of the Site was purchased by Mr. Peter Runton and was occupied by Classic Design, a fiberglass sunroof manufacturing and installation company, until 1993. Since 1993, 238 Bodwell Street has been occupied by Conrad Corporation, a manufacturer of wooden office fixtures.

2.0 SUMMARY OF RAO ACTIVITIES

In order to determine that "No Significant Risk" exists at the Site pursuant to the revised MCP 310, CMR 40.0000, a Phase I - Initial Site Investigation was undertaken by CONECO in April, 1995. The purpose of the subsurface investigation program was to obtain qualitative and quantitative environmental data on current soil and groundwater conditions at the Site. As such, the field investigation consisted of surficial observations, test borings, headspace screening of soil boring samples, installation of additional groundwater monitoring wells, soil and groundwater sampling, and laboratory analysis of soil and groundwater.

2.1 Soil Sampling and Analysis

Eight test borings, designated B-8 through B-15, were performed at the Site on March 17, 1995. Test boring soil samples were screened for volatile compounds using an HNu Model HW-101 PID. Selected soil samples from six of the borings were submitted to National Environmental Testing, Inc. (NET), and analyzed for VOCs by EPA Method 8240, and TPH by EPA Method 418.1.

Observations made during the performance of the test borings indicated deposits of fill material from grade to approximately 2 to 5 feet below grade underlain by glacial till from 2 to 6 feet below grade. The glacial till was underlain by bedrock. The only photoionization detector (PID) reading measured during this test boring program was recorded at B-8 (4-6') at 0.8 ppm. No other volatile compounds were detected during the test boring program.

Soil analysis of the test boring samples revealed no concentrations of TPH or VOCs at or above the Method I Risk Characterization Standards for S-2 Soil (310 CMR 40.0975(6)(a)) as determined in section 3.0, Risk Characterization. A TPH concentration (610 ppm) detected in boring B-8 at a depth of 2 to 4 feet below grade is considered to be a separate release from the initial listing of the Site, which relates to chlorinated compounds. As such, this TPH concentration is below the reportable concentration of 2,500 ppm for S-2 soil (RCS-2); therefore, is not subject to any reporting criteria as defined in the MCP (310 CMR 40.0000).

2.2 Groundwater Sampling and Analysis

Groundwater monitoring wells were installed in four of the eight test boring locations on March 17, 1995. The groundwater flow direction at the Site was determined to have an overall hydraulic gradient in a southeasterly direction. Groundwater samples were taken from all on-Site monitoring wells having sufficient groundwater. Groundwater samples from three monitoring wells and two existing monitoring wells were collected on March 24, 1995 and were submitted to NET, Inc. for analysis. Specifically, Groundwater samples from monitoring wells CMW-1 through CMW-3, KOW-2, and MW-5 were analyzed for VOCs by EPA Method 8240. Groundwater samples from monitoring wells CMW-2, CMW-3, KOW-2, and MW-5 were also analyzed for dissolved cadmium and chromium by EPA Method 200 (ICP).

Methylene chloride was detected in the sample from monitoring well CMW-2 at 42 µg/l and 2-Butanone (MEK) was detected in CMW-3 at 28 µg/l. The Method 1 Standard for these compounds is 50,000 µg/l for methylene chloride and MEK, as derived in Section 3.0. As such, the laboratory analysis of groundwater samples from the five on-Site monitoring wells revealed no concentrations of VOCs at or above the Method I Risk Characterization Standards for GW-2 and GW-3 Groundwater (310 CMR 40.0974(2)).

3.0 RISK CHARACTERIZATION

Under the MCP, once a property has been classified as a Disposal Site, a risk assessment is necessary to demonstrate that a condition of No Significant Risk to health, safety, public welfare, and the environment exists at the Site. Otherwise, further remedial actions are required to achieve a condition of "No Significant Risk."

To determine whether further action is required at the Site, it is first necessary to determine whether a condition of "No Significant Risk" exists using Method 1, Method 2 or Method 3 Risk Characterization procedures. The following sections present the classifications of soil and groundwater for an MCP Method 1 Risk Characterization, and the applicable threshold concentrations for the contaminants present at the Site.

3.1 Soil Categories

The classifications for soil are listed at 310 CMR 40.0933. Soil at a given property is classified as S-1, S-2, or S-3, based upon exposure potential criteria: Frequency of use by adults and children, the intensity of the use of the Site, and the accessibility of the soil. Frequency of use is classified as "high, low, or not present." Intensity is classified as "high or low," and soil accessibility is described as "accessible, potentially accessible, or isolated." The Site is classified as follows:

Frequency of Use: Adults are present at the Disposal Site at "high frequency," as adults work in the surrounding environment on a continuing basis. No children are present at the Disposal Site.

Intensity of Use: Intensity of use at the Site is considered "high," as potential Site activities have the potential to disturb soil and thus result in either direct contact with the soil, or inhalation of soil-derived dust.

Accessibility: Soil is considered "potentially accessible," since the area of potential soil contamination is between 3 and 15 feet below grade.

Using these parameters, soils at the Site are classified as Category S-2.

3.2 Groundwater Categories

The classifications for groundwater are listed at 310 CMR 40.0932. Groundwater at all locations is classified as category GW-3, based upon its potential to discharge to surface water. Groundwater can also be classified as GW-1 based upon potential to be used as drinking water supply, and as GW-2, based upon the potential for inhalation of vapors of oil or hazardous materials in indoor air.

The GW-1 groundwater classification evaluation for the Site, based upon a DEP Geographic Information Survey (GIS) Site Scoring Map, and information available from the Avon Health Department and Conservation Commission, is shown in the following table:

Table 1 - GW-1 Groundwater Classification Criteria

GW-1 Criteria	GW-1 Classification
1) within the Zone II for a public water supply	No
2) within an Interim Wellhead Protection Area	No
3) within a Potentially Productive Aquifer	No
4) within the Zone A of a Class A surface water body used as a public water supply	No
5) at any point located 500 or more feet from a public water supply distribution pipeline,.	No
6) at any groundwater sampling point located within 500 feet of a private water supply well	No

Under these criteria, groundwater at the Site is not subject to the GW-1 classification. Groundwater at the Site from monitoring wells CMW-2, CMW-3, KOW-2, and MW-5 are classified as category GW-2, as these sampling points are located within 30 feet of a building, and the average depth to groundwater is less than 15 feet. Groundwater from monitoring well CMW-1 is not classified as GW-2, as this sampling point is greater than 30 feet from the Site buildings. All groundwater at the Site is also classified as GW-3, based upon its potential to discharge to surface water.

3.3 Method 1 Risk Characterization

Using the soil and groundwater classifications derived above, Method 1 soil and groundwater threshold concentrations for each contaminant detected at the Site are listed in the MCP at Table 2 (310 CMR 40.0975(6)(a)) and Table 1 (310 CMR 40.0974(2)), respectively. The most stringent concentration from each groundwater classification is considered to be the threshold under which a concentration of No Significant Risk exists.

Table 2 - Method 1 Risk Characterization - Soil

	Soil (µg/g)					
Classification	**TPH**	**Benzene**	**Toluene**	**Ethylbenzene**	**Xylenes**	**Acetone**
S-2/GW-2	2,500	60	500	1,000	500	60
S-2/GW-3	2,500	60	1,000	500	1,000	60
Method 1 Standard	2,500	60	500	500	500	60

Note: Only S-2/GW-3 standards are applicable to monitoring well CMW-1.

Using these criteria and the analytical data presented in Section 8.0, the Method 1 Standards for soil for TPH and acetone were not exceeded.

Table 3 - Method 1 Risk Characterization - Groundwater

	Groundwater (µg/l)						
Classification	**TPH**	**Benzene**	**Toluene**	**Ethylbenzene**	**Xylenes**	**MC**	**MEK**
GW-2	NA	2,000	6,000	30,000	6,000	50,000	50,000
GW-3	50,000	7,000	50,000	4,000	50,000	50,000	50,000
Method 1 Standard	50,000	2,000	6,000	4,000	6,000	50,000	50,000

Notes: MC = Methylene Chloride
MEK = Methyl Ethyl Ketone

Using these criteria and the analytical data presented in Section 8.0, the Method 1 Standards for groundwater for acetone, methylene chloride, and methyl ethyl ketone were not exceeded. Therefore, based on current analytical data, a condition of No Significant Risk currently exists in soil and groundwater at the Site.

Future uses at the Disposal Site include industrial and commercial activities relating to the Avon Industrial Park. The existing and future soil and groundwater conditions are below the applicable soil and groundwater standards. The source of the release which includes a discharge to the septic system has been eliminated with the closing of Winchester Industries operations at the Disposal Site.

4.0 Response Action Outcome

Environmental conditions of the industrial property located at 230 and 238 Bodwell Street in Avon, Massachusetts were evaluated within the meaning of a "Response Action Outcome" as presented in the revised "Massachusetts Contingency Plan" (310 CMR 40.0000). The supporting documentation for the RAO includes the Phase I - Initial Site Investigation dated April 19, 1995. The purpose of this Phase I - Initial Site Investigation was to describe current Site conditions, determine Site history, and to evaluate potential soil and groundwater relating to elevated concentrations of chlorinated compounds discovered at the Site in 1988.

A summary and conclusions of the RAO are as follows:

- No uncontrolled sources of contamination are present at the Disposal Site. As a result, no response actions are necessary at the Disposal Site. The source of the release which

includes a discharge to the septic system has been eliminated with the closing of Winchester Industries operations at the Disposal Site.

- Monitoring of groundwater quality at the previously affected groundwater monitoring wells for four years has detected no VOCs.

- A condition of "No Significant Risk" exists for the soil and groundwater, as none of the concentrations of the detected compounds were at or above the Method 1 Standards. As such, a condition of "No Significant Risk" is present at the Site, as defined in 310 CMR 40.0006.

- The soils and groundwater conditions determined in the Phase I - Initial Site Investigation for the Disposal Site ensure a level of control at the Site such that no such that no level of oil or hazardous material shall present a significant risk of harm to health, safety, welfare or the environment during any foreseeable period of time.

- Conditions for a Class B-1 RAO specified at 310 CMR 40.1045 and 310 CMR 40.1046 have been met at the Site.

If there are any questions or additional information is required, please contact the undersigned.

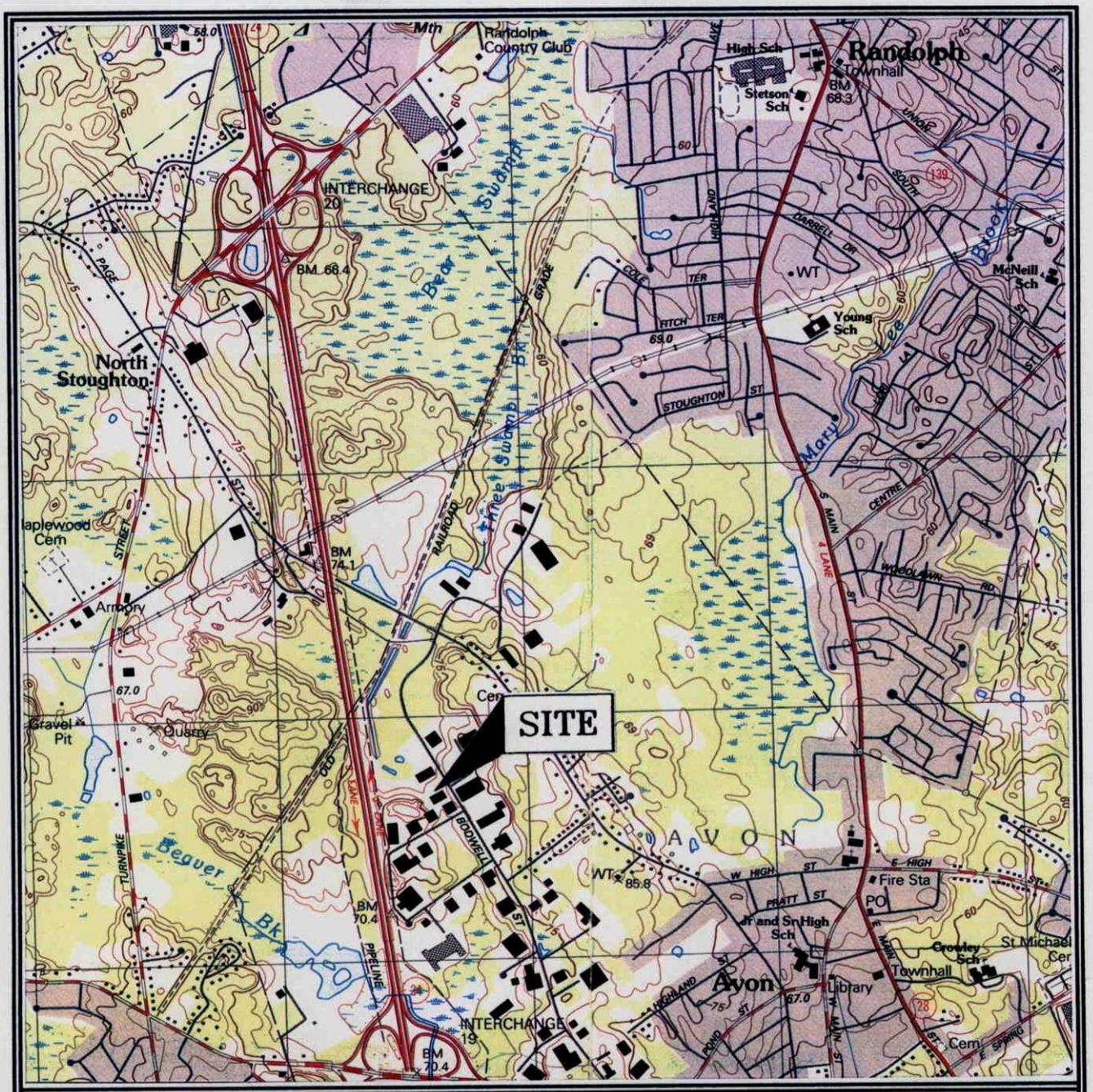
Respectfully Submitted,,
CONECO Environmental Corporation

Derek C. Volkin
Project Geologist

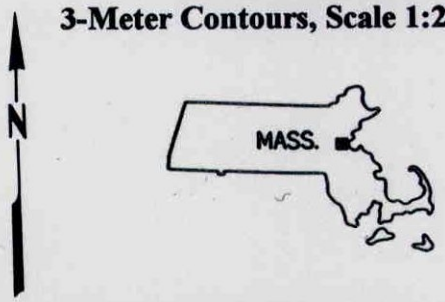
Brian F. Klingler
Project Manager

Ronald F. Bukoski, P.E., L.S.P.
Principal

BFK:RFB; eh
bfk/a68



U.S.G.S. 1985 Norwood Quadrangle
3-Meter Contours, Scale 1:25,000



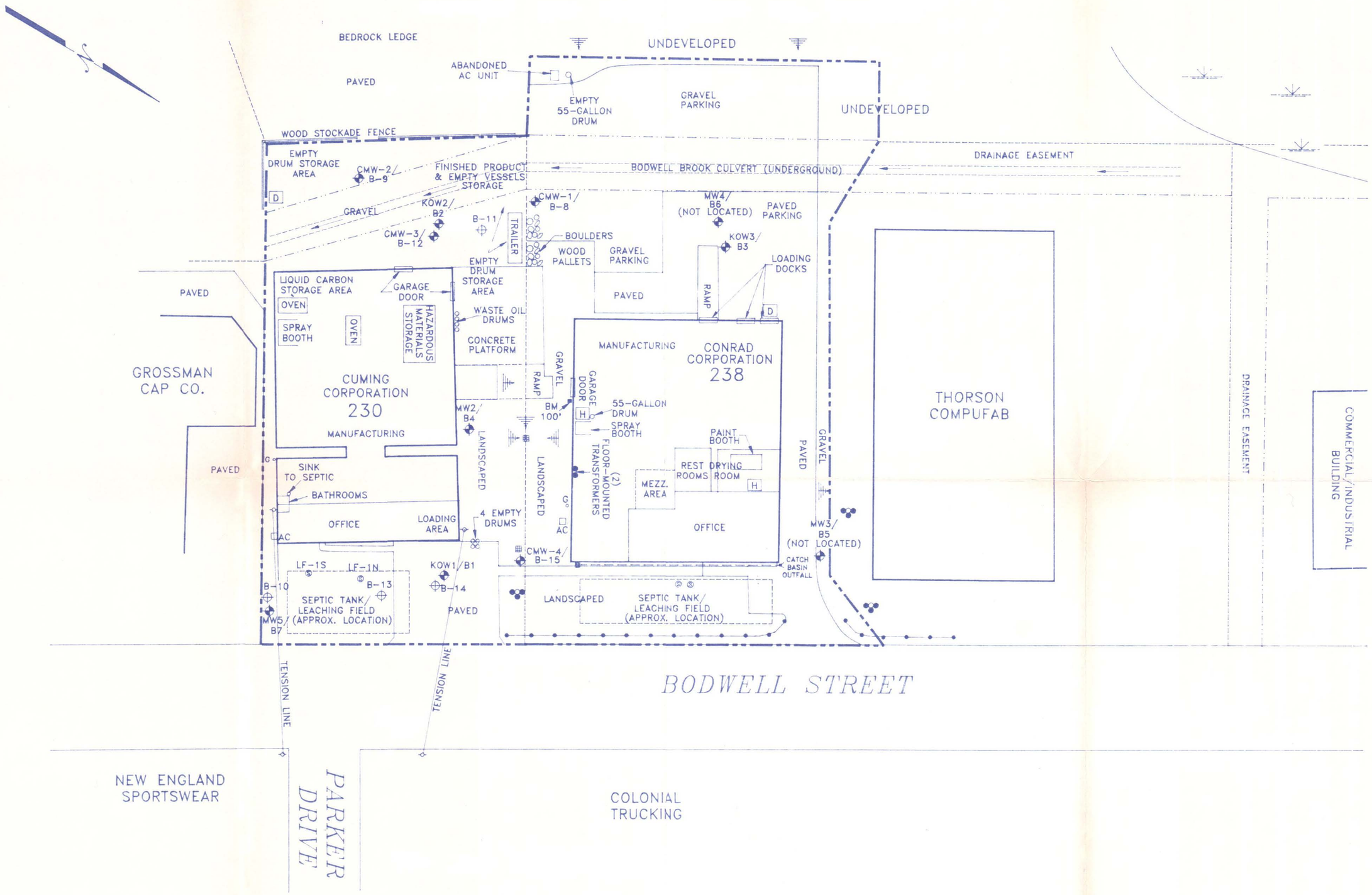
Coordinates: 42° 08' 13"N 71° 03' 39"

CONECO ENVIRONMENTAL

Site Locus Map

Former Winchester Industries
230 and 238 Bodwell Street
Avon, Massachusetts

FIGURE 1



NOTE:
SITE PLOT PLAN ADAPTED FROM AVON ASSESSORS' MAP AND MAY 6, 1988 KURZ ASSOCIATES, INC. 21E ASSESSMENT REPORT

0 40 80
SCALE: 1"=40'

LEGEND

- SITE BOUNDARY
- LOT BOUNDARY
- EASEMENT BOUNDARY
- POST & RAIL FENCE
- CMW-1 CONECO MONITORING WELL LOCATION & NUMBER
- UTILITY POLE
- SEPTIC MANHOLE
- SLOPE DOWN
- H HAZARDOUS MATERIALS STORAGE CABINET
- G GAS METER
- WETLANDS
- AC AIR CONDITIONER UNIT
- (3) POLE-MOUNTED TRANSFORMERS
- CATCH BASIN
- D DUMPSTER

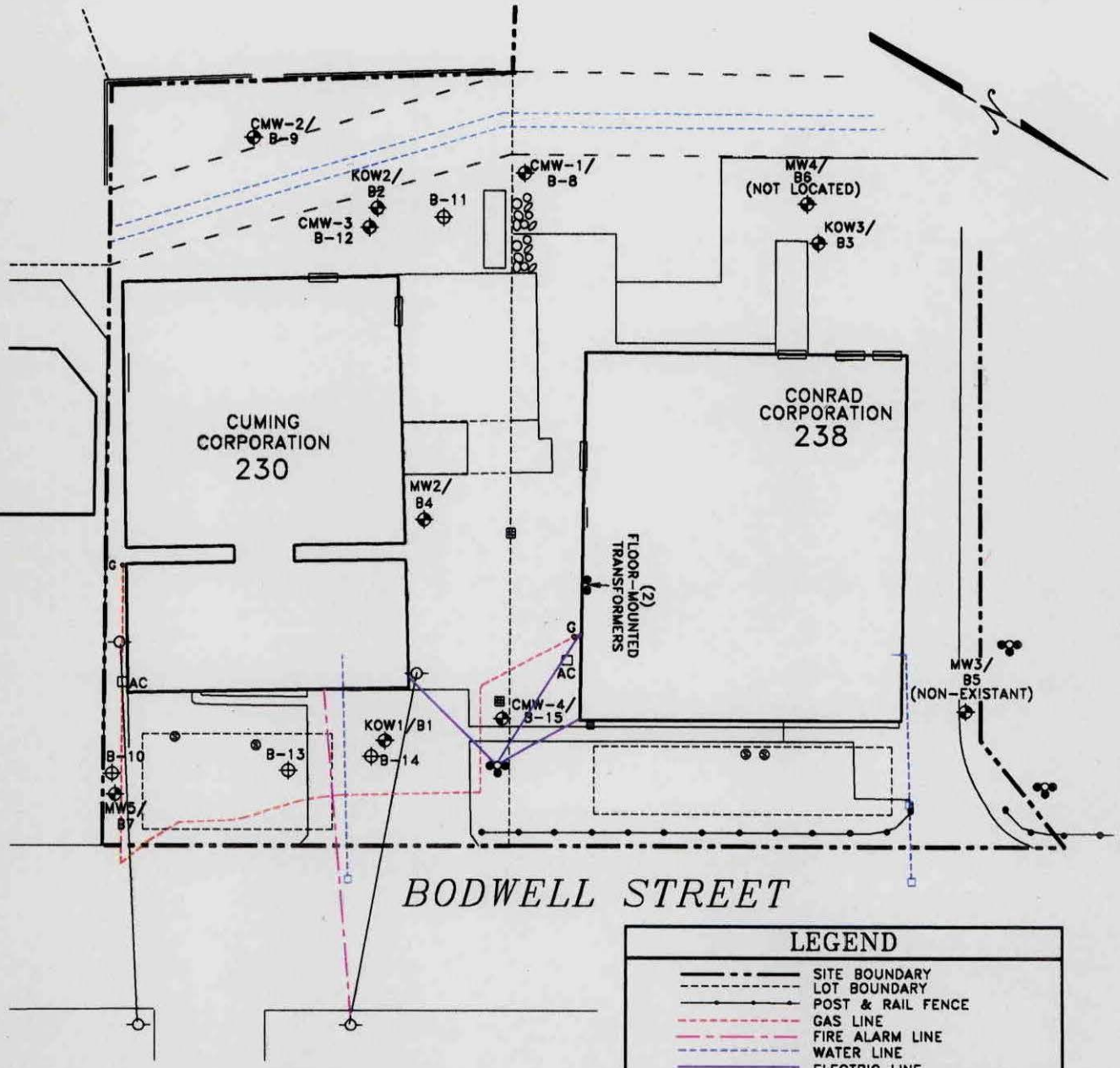
CONECO ENVIRONMENTAL
4 FIRST STREET, BRIDGEWATER, MASSACHUSETTS (508) 697-3191

	DRAWN	CHECKED	APPROVED
BY	C.K.M.		
DATE	3/28/95		

SITE PLOT PLAN

FORMER WINCHESTER INDUSTRIES, INC.
238 BODWELL STREET
AVON, MASSACHUSETTS

SCALE	PROJECT NO.	DRAWING NUMBER
AS NOTED	3184	FIGURE 2



NOTE:
SITE PLOT PLAN ADAPTED FROM AVON ASSESSORS' MAP AND MAY 6, 1988 KURZ ASSOCIATES, INC. 21E ASSESSMENT REPORT

LEGEND

- SITE BOUNDARY
- LOT BOUNDARY
- POST & RAIL FENCE
- GAS LINE
- FIRE ALARM LINE
- WATER LINE
- ELECTRIC LINE
- CMW-1 — CONECO MONITORING WELL LOCATION & NUMBER
- SEWER MANHOLE
- G — GAS METER
- AC — AIR CONDITIONER UNIT
- WATER BOX
- (3) POLE-MOUNTED TRANSFORMERS
- CATCH BASIN
- UTILITY POLE

CONECO ENVIRONMENTAL

4 FIRST STREET, BRIDGEWATER, MASSACHUSETTS (508) 697-3191

UTILITIES PLAN

FORMER WINCHESTER INDUSTRIES, INC.
238 BODWELL STREET
AVON, MASSACHUSETTS

	DRAWN	CHECKED	APPROVED
BY	C.K.M.		
DATE	4/7/95		

SCALE	PROJECT NO.	DRAWING NUMBER
AS NOTED	3184	FIGURE 3

MA DEP - Bureau of Waste Site Cleanup

Site Scoring Map: 500 feet & 0.5 Mile Radii

SITE NAME:

FORMER WINCHESTER INDUSTIRES
230 & 238 BODWELL ST
AVON, MA
4686650n 329625ew

March 28, 1995

0 2000 feet
0 500 meters

SCALE 1:15000

The information shown on this map is the best available at the date of printing. Please refer to the data source descriptions document.

- Potentially Productive Medium Yield Aquifer
- Potentially Productive High Yield Aquifer
- NOT Potentially Productive Medium Yield Aquifer
- NOT Potentially Productive High Yield Aquifer
- EPA Designated Sole Source Aquifers
- DEP Approved Wellhead Protection Area - ZONE 2
- Interim Wellhead Protection Area
- Public Surface Water Supply
- Lakes, Ponds, Other Fresh Water Features
- Bays, Estuaries, Other Salt Water Features
- Fresh Water Non-Forested Wetlands
- Salt Water Wetlands
- State, Federal, Municipal, Nonprofit and Private Open Space and Recreational Facilities
- Areas of Critical Environmental Concern
- DEP Permitted Solid Waste Facilities
- NHESP Estimated Habitats of Rare Wetlands Wildlife 1995 - for use with Wetlands Protection Act ONLY

- State, U.S., Interstate Routemarkers
- Interstate Highway
- U.S. Highway
- State Highway
- Other Roads
- Municipal Boundary
- County Boundary
- Train
- Powerline
- Pipeline
- Aqueduct
- Major Drainage Basin
- Sub Drainage Basin
- Zone of Contribution
- Public Water Supply - Groundwater
- Public Water Supply - Surface Water
- Non Community Public Water Supply
- Certified Vernal Pools

DEP

MASSGIS

N
W E
S

FIGURE 4

1

Appendix A

Site Photographs

Photo 1: Front Portion of Conrad Corporation, 238 Bodwell Street
(Note: Three Pole-Mounted Transformers)

Photo 2: Rear Portion of 238 Bodwell Street
(Note: View Facing East)

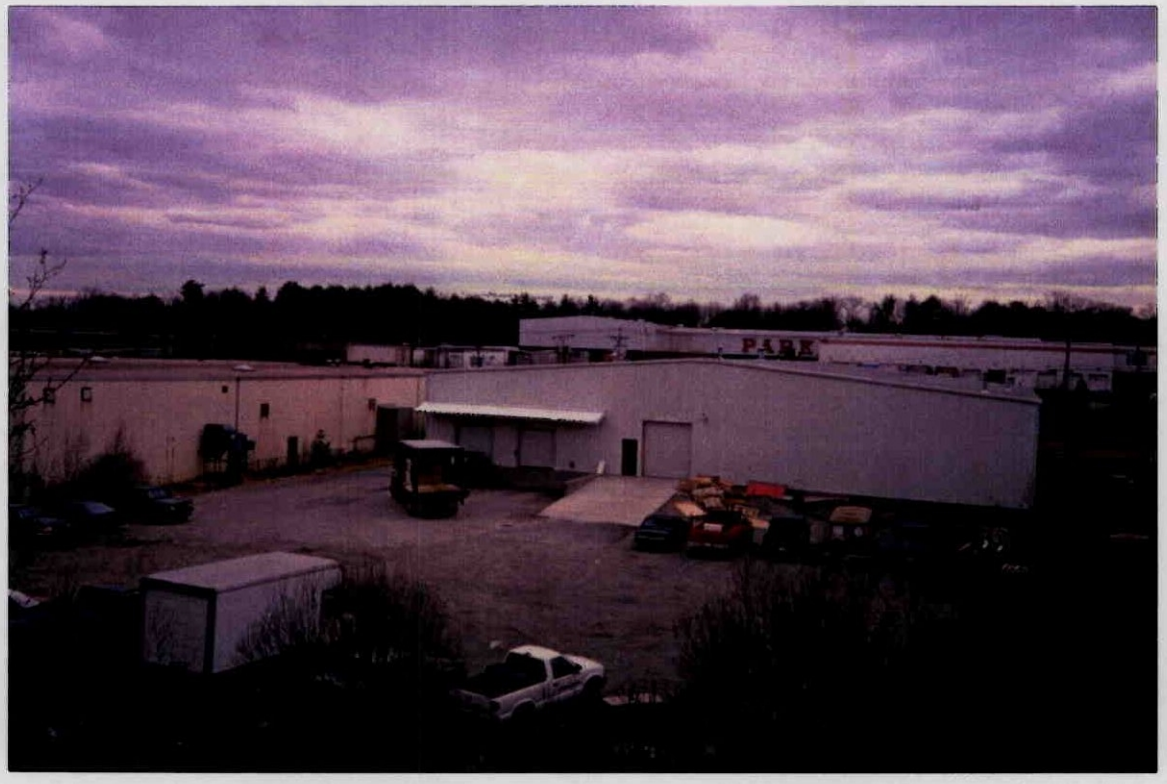


Photo 3: Rear Portion of 238 Bodwell Street
(Note: View Facing East)

Photo 4: Empty Drum Storage Area. Rear Portion of Cuming Corporation, 230 Bodwell Street
(Note: Photo taken from 238 Bodwell Street, View Facing South)

Photo 5: Interior of Conrad Corporation, 238 Bodwell Street

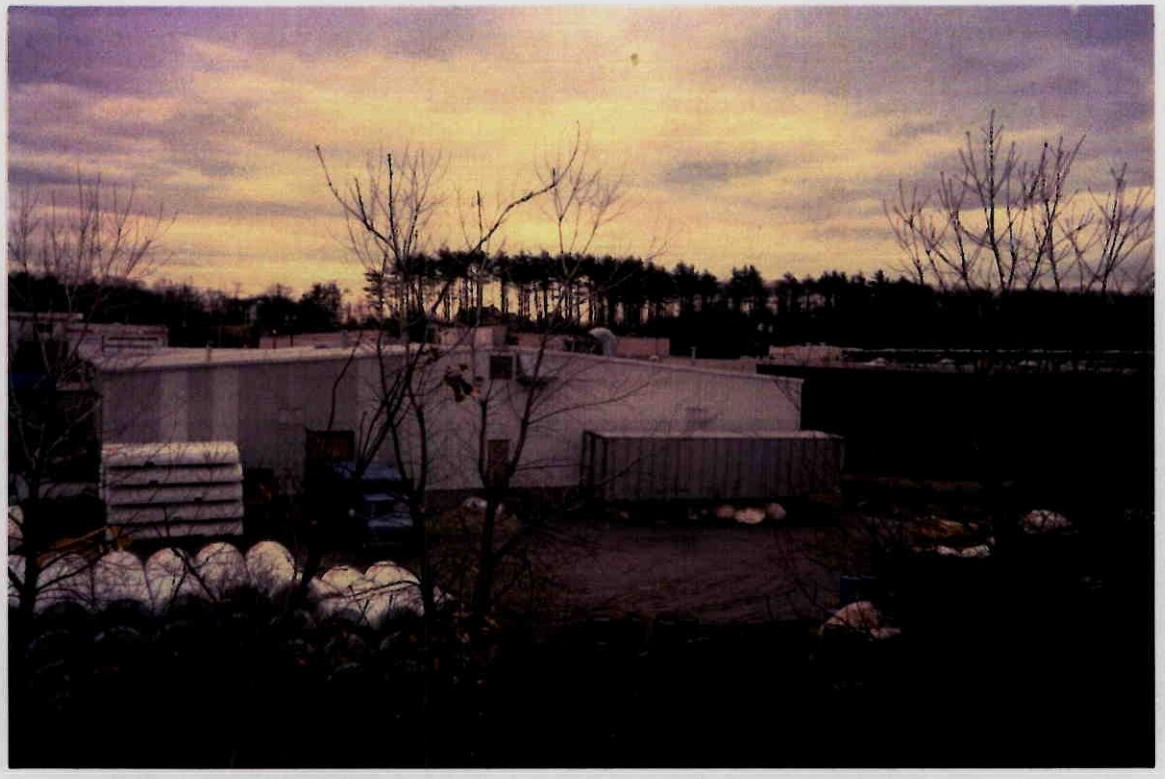


Photo 6: Rear Portion of Cuming Corporation, 230 Bodwell Street (Note: Empty drum storage areas along the fence)

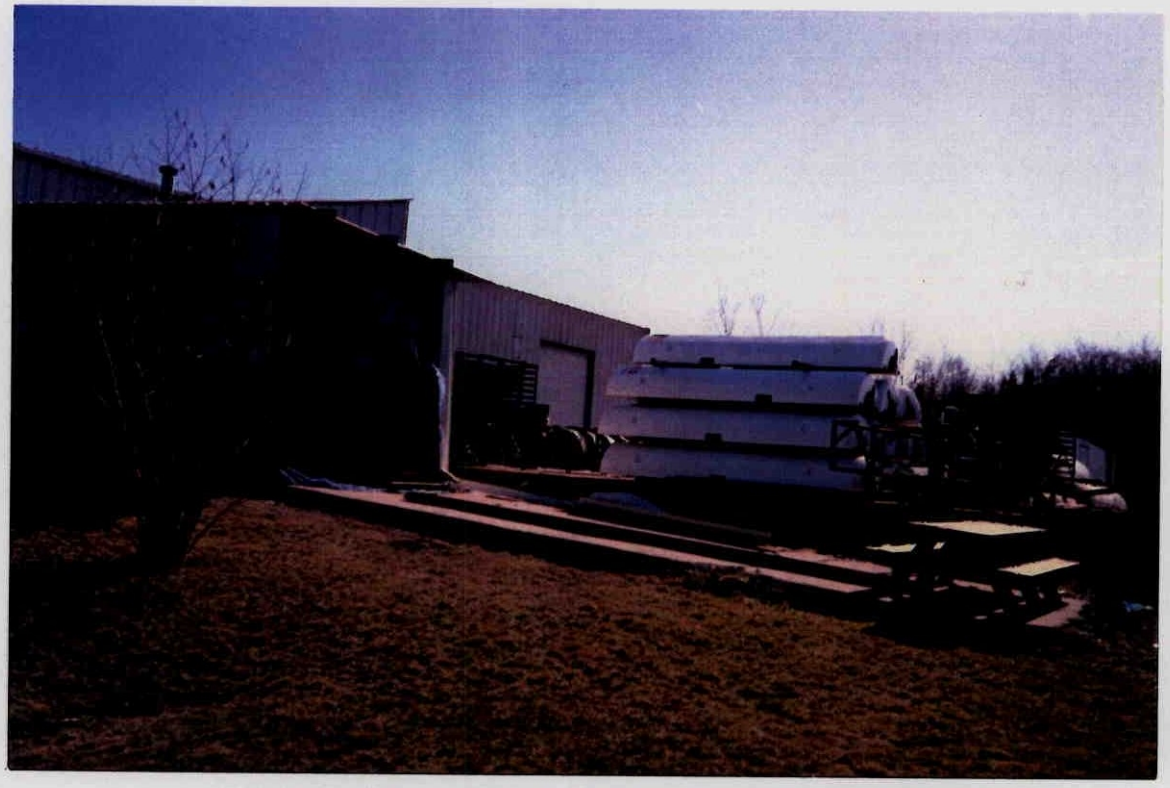


Photo 7: Ramp Way and Elevated Concrete Platform
(Note: Located between Site buildings)

Photo 8: Typical Interior - Cuming Corporation, 230 Bodwell Street
(Note: Cinder block low temperature oven located to the left)

2

Appendix B

Response Action Outcome Statement

Massachusetts Department of Environmental Protection **BWSC-104**
Bureau of Waste Site Cleanup

RESPONSE ACTION OUTCOME (RAO) STATEMENT & DOWNGRADIENT PROPERTY STATUS TRANSMITTAL FORM

Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

Release Tracking Number: 4 - 0634

A. SITE OR DOWNGRADIENT PROPERTY LOCATION:

Site Name: (optional) Winchester Industries

Street: 230 Bodwell Street Location Aid: Legris Road

City/Town: Avon ZIP Code: 02322

☐ Check here if this Site location is Tier Classified. If a Tier I Permit has been issued, state the Permit Number: _____

Related Release Tracking Numbers that this Form Addresses: _____

If submitting an RAO Statement, you must document the location of the Site or the location and boundaries of the Disposal Site subject to this Statement. If submitting an RAO Statement for a PORTION of a Disposal Site, you must document the location and boundaries for both the portion subject to this submittal and, to the extent defined, the entire Disposal Site. If submitting a Downgradient Property Status Submittal, you must provide a site plan of the property subject to the submittal and, to the extent defined, the Disposal Site.

B. THIS FORM IS BEING USED TO: (check all that apply)

☒ Submit a **Response Action Outcome (RAO) Statement** (complete Sections A, B, C, D, E, F, H, I, J and L).

☐ Check here if this is a revised RAO Statement. Date of Prior Submittal: _____

☐ Check here if any Response Actions remain to be taken to address conditions associated with any of the Releases whose Release Tracking Numbers are listed above. This RAO Statement will record only an RAO-Partial Statement for those Release Tracking Numbers.

Specify Affected Release Tracking Numbers: _____

☐ Submit an optional **Phase I Completion Statement supporting an RAO Statement or Downgradient Property Status Submittal** (complete Sections A, B, H, I, J, and L).

☐ Submit a **Downgradient Property Status Submittal** (complete Sections A, B, G, H, I, J and K).

☐ Check here if this is a revised Downgradient Property Status Submittal. Date of Prior Submittal: _____

☐ Submit a **Termination of a Downgradient Property Status Submittal** (complete Sections A, B, I, J and L).

☐ Submit a **Periodic Review Opinion evaluating the status of a Temporary Solution** (complete Sections A, B, H, I, J and L).

Specify one: ☐ For a Class C RAO ☐ For a Waiver Completion Statement indicating a Temporary Solution

Provide Submittal Date of RAO Statement or Waiver Completion Statement: _____

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

C. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

☒ Assessment and/or Monitoring Only

☐ Removal of Contaminated Soils

☐ Re-use, Recycling or Treatment

○ On Site ○ Off Site Est. Vol.: _____ cubic yards

Describe: _____

☐ Landfill ○ Cover ○ Disposal Est. Vol.: _____ cubic yards

☐ Removal of Drums, Tanks or Containers

Describe: _____

☐ Removal of Other Contaminated Media

Specify Type and Volume: _____

☐ Other Response Actions

Describe: _____

☐ Deployment of Absorbant or Contaminent Materials

☐ Temporary Covers or Caps

☐ Bioremediation

☐ Soil Vapor Extraction

☐ Structure Venting System

☐ Product or NAPL Recovery

☐ Groundwater Treatment Systems

☐ Air Sparging

☐ Temporary Water Supplies

☐ Temporary Evacuation or Relocation of Residents

☐ Fencing and Sign Posting

SECTION C IS CONTINUED ON THE NEXT PAGE.

Massachusetts Department of Environmental Protection **BWSC-104**
Bureau of Waste Site Cleanup

RESPONSE ACTION OUTCOME (RAO) STATEMENT & DOWNGRADIENT PROPERTY STATUS TRANSMITTAL FORM

Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

Release Tracking Number: 4 - 0634

C. DESCRIPTION OF RESPONSE ACTIONS: (continued)

☐ Check here if any Response Action(s) that serve as the basis for this RAO Statement involve the use of Innovative Technologies. (DEP is interested in using this information to create an Innovative Technologies Clearinghouse.)

Describe Technologies: _____

D. TRANSPORT OF REMEDIATION WASTE: (If Remediation Waste was sent to an off-site facility, answer the following questions)

Name of Facility: _____

Town and State: _____

Quantity of Remediation Waste Transported to Date: _____

E. RESPONSE ACTION OUTCOME CLASS:

Specify the Class of Response Action Outcome that applies to the Site or Disposal Site. Select **ONLY** one Class:

☐ **Class A-1 RAO:** Specify one of the following:

○ Contamination has been reduced to background levels. ○ A Threat of Release has been eliminated.

☐ **Class A-2 RAO:** You **MUST** provide justification that reducing contamination to background levels is infeasible.

☐ **Class A-3 RAO:** You **MUST** provide both an implemented Activity and Use Limitation (AUL) and justification that reducing contamination to background levels is infeasible.

If applicable, provide the earlier of the AUL expiration date or date the design life of the remedy will end: _____

☒ **Class B-1 RAO:** Specify one of the following:

⊗ Contamination is consistent with background levels ○ Contamination is **NOT** consistent with background levels.

☐ **Class B-2 RAO:** You **MUST** provide an implemented AUL.

If applicable, provide the AUL expiration date : _____

☐ **Class C RAO:** ☐ Check here if you will conduct post-RAO Operation, Maintenance and Monitoring at the Site.

Specify One: ○ Passive Operation and Maintenance ○ Monitoring Only

○ Active Operation and Maintenance (defined at 310 CMR 40.0006)

F. RESPONSE ACTION OUTCOME INFORMATION:

☐ If an RAO Compliance Fee is required, check here to certify that the fee has been submitted. You **MUST** attach a photocopy of the payment.

☐ Check here if submitting one or more AULs. You must attach an AUL Transmittal Form (BWSC-113) and a copy of each implemented AUL related to this RAO Statement. Specify the type of AUL(s) below. (required for all Class A-3 RAOs and Class B-2 RAOs)

○ Notice of Activity and Use Limitation ○ Grant of Environmental Restriction Number of AULs attached: _____

Specify the Risk Characterization Method(s) used to achieve the RAO described above and all Soil and Groundwater Categories applicable to the Site.

More than one Soil Category and more than one Groundwater Category may apply at a Site.
Be sure to check off all APPLICABLE categories, even if more stringent soil and groundwater standards were met.

Risk Characterization Method(s) Used:	☐ Method 1	☐ Method 2	☐ Method 3
Soil Category(ies) Applicable:	☐ S-1	☒ S-2	☐ S-3
Groundwater Category(ies) Applicable:	☐ GW-1	☒ GW-2	☒ GW-3

> **When submitting any Class A-1 RAO or a Class B-1 RAO where contamination is consistent with background levels, do NOT specify a Risk Characterization Method.**

> **When submitting any Class A-2 RAO or a Class B-1 RAO where contamination is NOT consistent with background levels, you cannot use an AUL to maintain a level of no significant risk. Therefore, you must meet S-1 Soil Standards, if using Risk Characterization Method 1.**

Massachusetts Department of Environmental Protection **BWSC-104**
Bureau of Waste Site Cleanup

RESPONSE ACTION OUTCOME (RAO) STATEMENT & DOWNGRADIENT PROPERTY STATUS TRANSMITTAL FORM

Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

Release Tracking Number: 4 - 0634

G. DOWNGRADIENT PROPERTY STATUS SUBMITTAL:

☐ If a Downgradient Property Status Submittal Compliance Fee is required, check here to certify that the fee has been submitted. You **MUST** attach a photocopy of the payment.

☐ Check here if a Release(s) of Oil or Hazardous Material(s), other than that which is the subject of this submittal, has occurred at this property.

Release Tracking Number(s): _____

◯ Check here if the Releases identified above require further Response Actions pursuant to 310 CMR 40.0000.

Required documentation for a Downgradient Property Status Submittal includes, but is not limited to, copies of notices provided to owners and operators of both upgradient and downgradient abutting properties and of any known or suspected source properties.

H. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> *if Section B indicates that a **Downgradient Property Status Submittal** is being provided,* the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in 310 CMR 40.0183(2)(b), and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> *if Section B indicates that either an **RAO Statement, Phase I Completion Statement and/or Periodic Review Opinion** is being provided,* the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

☒ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

LSP Name: Ronald F. Bukoski LSP #: 5248 Stamp:

Telephone: (508) 697-3191 Ext.: _____

FAX: (optional) (508) 697-5996

Signature: Ronald F. Bukoski

Date: _____

COMMONWEALTH OF MASSACHUSETTS
RONALD F. BUKOSKI NO.5248
REGISTERED LICENSED SITE PROFESSIONAL

I. PERSON MAKING SUBMITTAL:

Name of Organization: Winchester Industries, Inc. (Dissolved 1992)

Name of Contact: Peter Runton Title: President

Street: 130 Randolph Avenue

City/Town: Milton State: MA ZIP Code: _____

Telephone: (617) 698-7557 Ext.: _____ FAX: (optional) _____

J. RELATIONSHIP TO SITE OF PERSON MAKING SUBMITTAL: (check one)

☒ RP or PRP Specify: ⓧ Owner ◯ Operator ◯ Generator ◯ Transporter Other RP or PRP: _____

☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ Any Other Person Submitting This Form Specify Relationship: _____

Massachusetts Department of Environmental Protection **BWSC-104**
Bureau of Waste Site Cleanup

RESPONSE ACTION OUTCOME (RAO) STATEMENT & DOWNGRADIENT PROPERTY STATUS TRANSMITTAL FORM

Pursuant to 310 CMR 40.0160 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

Release Tracking Number: 4 - 0634

K. CERTIFICATION OF PERSON SUBMITTING DOWNGRADIENT PROPERTY STATUS SUBMITTAL:

I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form; (ii) that, based on my inquiry of the/those individual(s) immediately responsible for obtaining the information, the material information contained herein is, to the best of my knowledge, information and belief, true, accurate and complete; (iii) that, to the best of my knowledge, information and belief, I/the person(s) or entity(ies) on whose behalf this submittal is made satisfy(ies) the criteria in 310 CMR 40.0183(2); (iv) that I/the person(s) or entity(ies) on whose behalf this submittal is made have provided notice in accordance with 310 CMR 40.0183(5); and (v) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is/are aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: _____ Title: _____
(signature)

For: _____ Date: _____
(print name of person or entity recorded in Section I)

Enter address of the person providing certification, if different from address recorded in Section I:

Street: _____

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ FAX: (optional) _____

L. CERTIFICATION OF PERSON MAKING SUBMITTAL:

If you are completing only a Downgradient Property Status Submittal, you do not need to complete this section of the form.

I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: Peter R. Lumbra Title: President
(signature)

For: Winchester Industries, Inc. Date: _____
(print name of person or entity recorded in Section I)

Enter address of the person providing certification, if different from address recorded in Section I:

Street: _____

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ FAX: (optional) _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE, AND YOU MAY INCUR ADDITIONAL COMPLIANCE FEES.